

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

Shawn C. McGuire

Debtor(s)

Case No.: 17-14056-elf

Chapter 13

MOTION TO MODIFY PLAN AFTER CONFIRMATION

The Debtor, Shawn C. McGuire, by and through his undersigned counsel, hereby move to modify his Chapter 13 Plan and in support thereof aver as follows:

1. Debtor filed a Chapter 13 Bankruptcy on or about June 9, 2017.
2. The Chapter 13 filing was assigned case number 17-14056.
3. The Chapter 13 Plan was confirmed by this Honorable Court on or about November 27, 2018.
4. Debtor lost his job as a result of the pandemic in June 2020 and is currently receiving unemployment and is actively searching for full-time employment.
5. This significant reduction in income has resulted in the Debtor unable to afford his Chapter 13 Plan payments.
6. Pursuant to the CARES Act, Debtor has experienced a material financial hardship, directly or indirectly caused by the COVID-19 virus.
7. Debtor's Plan was originally Confirmed prior to March 27, 2020.
8. In light of this, and to avoid dismissal of his case, Debtor is humbly requesting that he be allowed to modify and extend his Chapter 13 Plan to 7 years.
9. In furtherance thereof, this Motion and Modified Chapter 13 Plan are being contemporaneously filed.

10. This Plan remains a pro-rata payback to the unsecured creditors and is affordable to Debtor. (See **proposed modified Plan marked as "Exhibit A"**).

WHEREFORE, the Debtor requests that he be permitted to modify his Chapter 13 Plan for the above-stated reasons.

Dated: February 10, 2021

/s/Brad J. Sadek, Esq.
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